

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Nelda Juliani

Write the full name of each plaintiff.

CV
(Include case number if one has been assigned)

-against-

Do you want a jury trial?

☐ Yes ☒ No

Aleina Almeida

Meridian Intl Sourcing Group

Meridian Global

Write the full name of each defendant. The names listed above must be identical to those contained in Section I.

EMPLOYMENT DISCRIMINATION COMPLAINT

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

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I. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Nelda		Juliani
First Name	Middle Initial	Last Name
136 Hamden Ave		
Street Address		
Richmond SI	NY	10306
County, City	State	Zip Code
917-361-0981		
Telephone Number	Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. (Proper defendants under employment discrimination statutes are usually employers, labor organizations, or employment agencies.) Attach additional pages if needed.

Defendant 1:	Aleina Almeida
	Name
	180 Maiden Lane Suite 901
	Address where defendant may be served
	NY NY 10038
	County, City State Zip Code

Defendant 2:	
	Name
	Address where defendant may be served
	County, City State Zip Code

Defendant 3:

Name

Address where defendant may be served

County, City

State

Zip Code

II. PLACE OF EMPLOYMENT

The address at which I was employed or sought employment by the defendant(s) is:

Meridian International Sourcing Group

Name

180 Maiden Lane Suite 901

Address

NY

NY

10038

County, City

State

Zip Code

III. CAUSE OF ACTION

A. Federal Claims

This employment discrimination lawsuit is brought under (check only the options below that apply in your case):

- ☐ Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e to 2000e-17, for employment discrimination on the basis of race, color, religion, sex, or national origin

The defendant discriminated against me because of my (check only those that apply and explain):

☐ race: _____

☐ color: _____

☐ religion: _____

☐ sex: _____

☐ national origin: Albanian, I am filing because

my employer refuses to pay my wages

- ☐ **42 U.S.C. § 1981**, for intentional employment discrimination on the basis of race

My race is: _____

- ☐ **Age Discrimination in Employment Act of 1967**, 29 U.S.C. §§ 621 to 634, for employment discrimination on the basis of age (40 or older)

I was born in the year: _____

- ☐ **Rehabilitation Act of 1973**, 29 U.S.C. §§ 701 to 796, for employment discrimination on the basis of a disability by an employer that constitutes a program or activity receiving federal financial assistance

My disability or perceived disability is: _____

- ☐ **Americans with Disabilities Act of 1990**, 42 U.S.C. §§ 12101 to 12213, for employment discrimination on the basis of a disability

My disability or perceived disability is: _____

- ☐ **Family and Medical Leave Act of 1993**, 29 U.S.C. §§ 2601 to 2654, for employment discrimination on the basis of leave for qualified medical or family reasons

B. Other Claims

In addition to my federal claims listed above, I assert claims under:

- ☐ **New York State Human Rights Law**, N.Y. Exec. Law §§ 290 to 297, for employment discrimination on the basis of age, race, creed, color, national origin, sexual orientation, military status, sex, disability, predisposing genetic characteristics, marital status
- ☐ **New York City Human Rights Law**, N.Y. City Admin. Code §§ 8-101 to 131, for employment discrimination on the basis of actual or perceived age, race, creed, color, national origin, gender, disability, marital status, partnership status, sexual orientation, alienage, citizenship status

- ☒ Other (may include other relevant federal, state, city, or county law):

Employer did not pay wages owed
from Oct 2021, - July 2021

IV. STATEMENT OF CLAIM

A. Adverse Employment Action

The defendant or defendants in this case took the following adverse employment actions against me (check only those that apply):

- ☐ did not hire me
- ☐ terminated my employment
- ☐ did not promote me
- ☐ did not accommodate my disability
- ☐ provided me with terms and conditions of employment different from those of similar employees
- ☐ retaliated against me
- ☐ harassed me or created a hostile work environment

☒ other (specify): not paid any wages for
8 months of employment

B. Facts

State here the facts that support your claim. Attach additional pages if needed. You should explain what actions defendants took (or failed to take) *because of* your protected characteristic, such as your race, disability, age, or religion. Include times and locations, if possible. State whether defendants are continuing to commit these acts against you.

I was hired by employer in 2019 November
September 2020 - employer took month off
so I worked with her briefly. October 5
2020, employer re-hired & promoted
me. Oct 5 2020 - July 7 2021 I was
not paid any wages. Employer then accused
me of theft, lying & not pay me

As additional support for your claim, you may attach any charge of discrimination that you filed with the U.S. Equal Employment Opportunity Commission, the New York State Division of Human Rights, the New York City Commission on Human Rights, or any other government agency.

V. ADMINISTRATIVE PROCEDURES

For most claims under the federal employment discrimination statutes, before filing a lawsuit, you must first file a charge with the U.S. Equal Employment Opportunity Commission (EEOC) and receive a Notice of Right to Sue.

Did you file a charge of discrimination against the defendant(s) with the EEOC or any other government agency?

☒ Yes (Please attach a copy of the charge to this complaint.)

When did you file your charge?

03/2022

☐ No

Have you received a Notice of Right to Sue from the EEOC?

☒ Yes (Please attach a copy of the Notice of Right to Sue.)

What is the date on the Notice?

3/23/2022

When did you receive the Notice?

☐ No

VI. RELIEF

The relief I want the court to order is (check only those that apply):

☐ direct the defendant to hire me

☐ direct the defendant to re-employ me

☐ direct the defendant to promote me

☐ direct the defendant to reasonably accommodate my religion

☐ direct the defendant to reasonably accommodate my disability

☒ direct the defendant to (specify) (if you believe you are entitled to money damages, explain that here):

I would like Justice to be served
and their money, wages owed to me
be paid. Nothing else.

VII. PLAINTIFF'S CERTIFICATION

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

4/12/2022
Dated
Nelda
First Name
Middle Initial
Last Name
136 Hamden Ave
Street Address
Staten Island NY 10306
County, City State Zip Code
917-361-0981 Telephone Number
Julianine197@gmail.com Email Address (if available)
zero

I have read the attached Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

MEMORANDUM

Recommendation for Closure

To: FIILE Charge No. 520-2022-03976
 From: Debra L. Richards
Investigator
 Subject: Nelda Juliani v. Meridian International
Sourcing Group
Charging Party *Respondent*

I recommend dismissal/closure of this charge based on the following:

- | | |
|---|---|
| <input type="checkbox"/> Failure to State a Claim | <input type="checkbox"/> Settlement / Mediation (Including withdrawals with benefits and successful conciliations) |
| <input type="checkbox"/> No Covered ADA Disability | <input type="checkbox"/> Withdrawal with Benefits |
| <input checked="" type="checkbox"/> Too Few Employees / Members | <input type="checkbox"/> Right to Sue (Issued on Request) |
| <input type="checkbox"/> Untimely | <input type="checkbox"/> Director Must Certify: Processing unlikely to be completed within 180 days of filing (Title VII/ADA) |
| <input type="checkbox"/> Not Reasonable Cause | |
| <input type="checkbox"/> Other _____ | |

Specific information in support of recommendation/decision:

CP claims something that the EEOC cannot assist her with. The Respondent has less than 15 employees and CP does not state a discrimination claim. She insisted on filing to get a NRTS.

She states she began working for Respondent on November 25, 2019, as an Executive Assistant. The Respondent furloughed her in August of 2020 due to a bank issue. CP was brought back to work on October 5, 2020 and promoted to Senior Executive Assistant. CP states she was not paid a penny of her salary from October 5, 2020 until July 7, 2021.

CP continually called Respondent from July 7, 2021 to ask what was happening and the CEO, Aleina Surratt-Almeida stated she had a bank issue but would not pay her back wages. The back wages are from October until July/2021; approximately 80k.

Recommending dismissing and issuing the NRTS.

Decision by /
 Recommendation approved by:

Debra L. Richards
 (Investigator's Signature)

03/23/2022
 (Date)